

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA )  
                                )  
                                ) CRIMINAL NO. 1:18-CR-83  
v.                            )  
                                )  
PAUL J. MANAFORT, JR.,    )  
                                )  
                                ) Trial Date: July 25, 2018  
                                )  
                                ) The Honorable T. S. Ellis, III  
Defendant.                  )  
                                )

**GOVERNMENT'S VOIR DIRE REQUESTS**

The Government respectfully requests that the Court include the following questions during voir dire.

Respectfully submitted,

ROBERT S. MUELLER, III  
Special Counsel

Uzo Asonye  
Assistant United States Attorney  
Eastern District of Virginia

By: \_\_\_\_\_ /s/

Andrew Weissmann  
Greg D. Andres  
Brandon L. Van Grack  
Special Assistant United States Attorneys  
Special Counsel's Office

U.S. Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530  
Phone: (202) 616-0800

REQUEST NO. 1

1. Do you or your spouse own a home?
  - A. If yes, have you now or in the past held a mortgage on that property?
  - B. If yes, from which financial institution did you obtain the mortgage? What was the amount of the mortgage?
2. Have you or your spouse ever refinanced a home mortgage?
  - A. If yes, from which financial institution did you obtain the refinancing? What was the amount that was refinanced?
3. Has a bank ever foreclosed on any property owned by you or your spouse?
4. Have you ever been denied a mortgage loan?
  - A. If yes, please briefly describe the circumstances and the denial, and whether your experience would prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?
5. Have you, or has any member of your family or close friend or relative, ever had a financial account, such as a bank account, outside of the United States?
  - A. If yes, please provide a brief description, including the type of account and its location.

REQUEST NO. 2

1. Do you file your own tax return? If not, who does?
2. Have you ever used an accountant or a tax preparer to prepare your tax return?

REQUEST NO. 3

1. Have you, or has any member of your family or close friend or relative, ever been the victim of, or witness to a crime, whether or not that crime was reported to law enforcement authorities?
  - A. If yes, please describe each crime, including the type of crime, whether anyone was caught, and the outcome.
2. Have you, or has any member of your family or close friend or relative, ever been accused of, arrested for, or charged with a crime?
  - A. If yes, please provide a brief description of the alleged crime(s) and the events leading up to the accusation, arrest, or charge.
  - B. If yes, do you feel that you, your family member, close friend, or relative were/was treated fairly by the criminal justice system?

REQUEST NO. 4

1. Have you, or has any member of your family or close friend or relative, ever been audited by the Internal Revenue Service?
  - A. If yes, please describe each audit and the outcome.
  - B. If yes, do you feel that you, your family member, close friend, or relative were/was treated fairly by the Internal Revenue Service?

REQUEST NO. 5

1. Apart from jury service, have you ever been involved in any legal proceeding, in any capacity, for example as a plaintiff, defendant, victim, lawyer, witness, or expert?
  - A. If yes, please state when and explain why you appeared in court?
  - B. If yes, did the legal process in that instance operate fairly in your opinion?

REQUEST NO. 6

1. Have you ever served as a juror at a trial in a federal, state, or local court prior to today?
  - A. If yes, without disclosing the verdict that you reached, please describe (a) whether it was criminal or civil, (b) the type of allegations, (c) when and where you served, and (d) whether the jury reach a unanimous verdict or, if permitted by the applicable law, a majority verdict.
2. Have you ever served as a juror on a grand jury in federal or state court?
  - A. If yes, when and where?
  - B. If yes, was the grand jury on which you served able to reach agreement on the issuance of true bills?
  - C. If your answer to the prior question is no, describe the nature of the case or cases on which the grand jury on which you served was unable to reach agreement on the issuance of true bills.

REQUEST NO. 7

1. Have you, or any members of your family, ever been employed by any law enforcement agency, such as: a police department, sheriff's department, constable's office, the Federal Bureau of Investigation (FBI), the Drug Enforcement Administration (DEA), the Bureau of Alcohol Tobacco and Firearms (ATF), the U.S. Marshal's Service, the U.S. Park Police, a United States Attorney's Office, the United States Department of Justice, a District or State's Attorney's Office, a probation or parole office, the Bureau of Prisons, or any other state, local or federal law enforcement agency or private security force?
  - A. If yes, for each person (yourself or family member) please state the law enforcement office or agency, the period of time employed, if known, and a general description of the job duties.
  - B. If yes, would the law enforcement employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

REQUEST NO. 8

1. Have you, or any members of your family, ever been employed by the Internal Revenue Service?
  - A. If yes, for each person (yourself or family member) please describe the period of time employed, if known, and a general description of the job duties.
  - B. If yes, would the employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

REQUEST NO. 9

1. Do you have strong feelings about the tax system of the United States, or the IRS?
  - A. If yes, what are those feelings?
2. Do you believe that violations of tax laws should not be prosecuted as crimes by the United States?
3. Do you believe that tax laws are unconstitutional?

REQUEST NO. 10

1. A number of witnesses may be either federal or state law enforcement officers. Would you tend to believe or to disbelieve the testimony of any law enforcement witness merely because that person is a law enforcement officer?
  - A. If yes, please explain why you would be more or less willing to believe such a witness and why.

REQUEST NO. 11

1. In this case, the United States is represented by the United States Department of Justice through Special Counsel Robert S. Mueller, III. Is there anything regarding the Special Counsel's Office that would prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?
  - A. If yes, please explain why.

REQUEST NO. 12

1. Have you, or any members of your family, ever been employed as an auditor, mortgage officer, tax preparer, or accountant?
  - A. If yes, for each person (yourself or family member) please describe the period of time employed, if known, and a general description of the job duties.
  - B. If yes, would the employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?
2. Have you, or any member of your immediate family, ever worked as an employee of a bank or financial institution?
  - A. If yes, for each person (yourself or family member) please describe the period of time employed, if known, and a general description of the job duties.
  - B. If yes, would the employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?
3. Have you, or any member of your immediate family, ever worked in the legal profession, either as a lawyer, paralegal, or in a law office, including a prosecutor's or public defender's office?
  - A. If yes, please explain.
  - B. If yes, would the legal employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case solely on the evidence presented and the Court's instructions on the law?
4. Have you, or any member of your immediate family, had any legal training, including law courses, paralegal programs, or on-the-job training?
  - A. If yes, please explain.
  - B. If yes, would the legal training that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case solely on the evidence presented and the Court's instructions on the law:

REQUEST NO. 13

1. The indictment charges the defendant with bank fraud, filing false tax returns, failing to report foreign bank accounts, and related conspiracy offenses. Is there anything about the nature of those charges that would make it difficult to be a fair and impartial juror in this case?
  - A. If yes, please explain.
2. The indictment charges that certain of the income involved in the tax and bank fraud charges was derived from political consulting and public relations work. Is there anything about the nature of those charges that would make it difficult to be a fair and impartial juror in this case?
  - A. If yes, please explain.
3. The indictment charges that certain of the income involved in the tax and bank fraud charges was derived from work for Ukrainian government officials, politicians, and political parties. Is there anything about the nature of those allegations that would make it difficult to be a fair and impartial juror in this case?
  - A. If yes, please explain.
4. Some of the witnesses in this case may be individuals who were involved in crimes themselves. They would testify pursuant to a cooperation agreement with the government or an immunity order. Is there anything that will prevent you from evaluating their testimony fairly and impartially in accordance with the Court's instructions?
  - A. If yes, please explain.

REQUEST NO. 14

1. This case has received significant publicity in the media. Have you seen, read, or heard anything at all about this case in any form of media, including newspaper, television, radio, or internet?
  - A. If yes, please explain (i) what you have seen, read, or heard, (ii) the source of that information, and (iii) when that occurred.
  - B. If yes, has the news coverage or other information you have seen, read, or heard about this case caused you to form an opinion about the defendant's guilt or innocence?
  - C. If yes, please explain.
  - D. Would you be able to put to one side everything you have seen, read, or heard about this case and not consider that information at all and decide the case fairly and impartially based solely on the evidence presented and the Court's instructions of law?

REQUEST NO. 15

1. Have you, any member of your immediate family, or any close personal friend ever run for or held a political office in the federal, state, or local government?
  - A. If yes, would anything about that person's running for or holding political office cause you to form an opinion about the defendant's guilt or innocence?
  - B. If yes, please explain.

REQUEST NO. 16

1. Do you, any member of your immediate family, or any close personal friend have any connection to Ukraine?
  - A. If yes, would anything about that connection to Ukraine cause you to form an opinion about the defendant's guilt or innocence?
  - B. If yes, please explain.

REQUEST NO. 17

1. The following is a partial list of individuals who may be associated with this case. Do you, to your knowledge, have any personal, family, or business connection of any sort with any of them?

[INSERT LIST]

REQUEST NO. 18

1. The jury will be instructed that the defendant is presumed to be innocent throughout the trial and that the defendant cannot be found guilty of any offense unless and until the government has proven each element of that offense beyond a reasonable doubt. Would you find it difficult for any reason to obey that instruction?
  - A. If yes, please explain.
2. If you are selected as a juror in this case, would it be difficult for you to disregard any ideas, notions, or beliefs about the law you may hold and render a fair and impartial verdict based solely on the evidence presented and the Court's instructions of law?
3. Do you have any moral, religious, or ethical beliefs that prevent you from sitting in judgment of another person in a criminal trial?
  - A. If yes, please explain.

REQUEST NO. 19

1. Do you suffer from any physical or mental condition(s) that would affect your ability to pay close and careful attention to the evidence and to render an impartial verdict?
  - A. If yes, please explain.

REQUEST NO. 20

1. This trial may run for approximately three weeks. In this respect, you should know that it is unlawful for an employer to discharge, threaten to discharge, intimidate, or coerce any employee because of the employee's jury service. Given this, is there any truly exigent circumstance that would preclude you from serving on this jury?
  - A. If yes, please explain.

REQUEST NO. 21

1. Is there anything about the nature of this case, including specifically (i) that it involves allegations of bank fraud and filing false tax returns, (ii) that it involves allegations relating to payments for lobbying work on behalf of Ukrainian politicians, or any other aspect of the nature of this case that would prevent or hinder you in any way from rendering a fair and impartial verdict based solely on the evidence presented and the Court's instructions of law?

A. If yes, please explain.

REQUEST NO. 22

1. Is there anything about the nature of these questions that suggest to you that you will not be able to sit as fair and impartial?
  - A. If yes, please explain:
2. Do you know of any other reason why you cannot sit as a juror in this case and judge evidence presented fairly and impartially and apply the law as instructed by the Court?
  - A. If yes, please explain:

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of July, 2018, I will cause to be filed electronically the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Thomas E. Zehnle (VA Bar No. 27755)  
Law Office of Thomas E. Zehnle  
601 New Jersey Avenue, N.W., Suite 620  
Washington, D.C. 20001  
[tezehnle@gmail.com](mailto:tezehnle@gmail.com)

Jay R. Nanavati (VA Bar No. 44391)  
Kostelanetz & Fink LLP  
601 New Jersey Avenue, N.W., Suite 620  
Washington, D.C. 20001  
[jnanavati@kflaw.com](mailto:jnanavati@kflaw.com)

/s/  
Uzo Asonye  
Assistant United States Attorney  
U.S. Attorney's Office  
Eastern District of Virginia  
2100 Jamieson Avenue  
Alexandria, VA 22314  
[uzo.asonye@usdoj.gov](mailto:uzo.asonye@usdoj.gov)  
Phone: (703) 299-3700  
Fax: (703) 299-3981

*Attorney for the United States of America*